

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	CHAPTER 11
KrisJenn Ranch, LLC,	§	
	§	
<i>Debtor</i>	§	CASE No. 20-50805

KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
DMA Properties, Inc.; and Longbranch	§	
Energy, LP, et al.,	§	
	§	
<i>Defendants.</i>	§	
	§	

DMA Properties, Inc. and Longbranch	§	
Energy, LP, et al.	§	
	§	
<i>Counterplaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
KrisJenn Ranch, LLC; Larry Wright, et	§	
al.,	§	
	§	
<i>Counterdefendants.</i>	§	

JOINT MOTION TO EXTEND BRIEFING DEADLINES

The parties respectfully request that the Court extend their existing briefing deadlines on remedies following remand of this case from the district court.

The parties have been engaged in continuing talks regarding settlement terms since July 21 and believe they are close to finalizing the terms of a settlement with respect to the parties' respective rights and interests in the pipeline right-of-way at issue in this case, as well as related efforts to operationalize and monetize the parties' interests in the same.

The parties now jointly move to extend their existing briefing deadlines to allow the parties to continue to finalize settlement terms in this matter. The parties believe that moving the briefing deadlines will facilitate settlement discussions, which have involved relatively complex issues regarding the transfer and operationalization of the right-of-way as between the interested parties. The Court and the parties can jointly coordinate at the status conference on November 2 regarding resetting this matter for argument if the parties cannot ultimately agree on settlement terms.

CONCLUSION

The parties thus respectfully request that the Court extend the briefing deadlines in this case as follows:

- DMA, Moore, and Longbranch's briefing shall be due on October 25, 2023.
- Wright and KrisJenn's briefing shall be due on December 1, 2023.

Respectfully submitted,

/s/ Christopher S. Johns

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CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with opposing counsel regarding this motion, and opposing counsel indicated that Wright and KrisJenn do not oppose this motion or the extensions sought herein.

/s/ Austin H. Krist
Austin H. Krist

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2023, a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States Mail, first class, postage prepaid, at the address noted below.

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